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***Attorneys for Defendants/Counterclaim
 Plaintiffs BrandTotal, Ltd. and Unimania,
 Inc.***

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO/OAKLAND DIVISION**

FACEBOOK, INC., a Delaware
 corporation,

*Plaintiff/Counterclaim
 Defendant,*

v.

BRANDTOTAL, LTD., an Israeli
 corporation, and
 UNIMANIA, INC., a Delaware
 corporation,

*Defendants/Counterclaim
 Plaintiffs.*

Case No.: 3:20-CV-07182-JCS

**DEFENDANTS BRANDTOTAL, LTD.
 AND UNIMANIA, INC.'S MOTION FOR
 PRELIMINARY INJUNCTION**

Judge: The Hon. Joseph C. Spero
 Ctrm.: Courtroom F – 15th Floor
 Date: April 9, 2021
 Time: 9:30 a.m.

TO THE COURT AND TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE THAT, on April 9, 2021, at 9:30 a.m., Defendants/Counterclaim Plaintiffs BrandTotal, Ltd. and Unimania, Inc. (collectively, “BrandTotal”), by and through undersigned counsel, will, and hereby do, respectfully move for preliminary injunction (“Motion”)—benefitted by a more complete record—and again ask the Court to enter an order requiring Facebook to:

(1) rescind the takedown request to remove the UpVoice extension from the Google Chrome Web Store and to not oppose the inclusion of a replacement UpVoice extension on the Store;

(2) reverse any “technical enforcement measures” blocking UpVoice from Facebook’s platform or otherwise prohibiting Panelists from sharing their information with BrandTotal; and

(3) restore the Facebook accounts of BrandTotal such that BrandTotal may resume advertising efforts to recruit Panelists.

Moreover, for the reasons set forth in BrandTotal’s Motion for Temporary Restraining Order, Dkt. 26, BrandTotal requests that this injunction be entered without requiring BrandTotal to post a bond, because, even if wrongfully enjoined, Facebook will suffer no damage.

This Motion is filed pursuant to the November 20, 2020, Order of the Court (ECF No. 74) and is based on the attached Memorandum; Declarations of Alon Leibovich, Oren Dor, and Rudolph A. Telscher, Jr.; Report of Robert Sherwood; Exhibits A-Z and Exhibits AA-DD filed herewith, the records and pleadings on file in this action, and upon such other pleadings and evidence that may be presented prior to or at any oral argument that may be permitted by the Court. A Proposed Order Granting Preliminary Injunction is also respectfully submitted herewith.

Date: February 18, 2021

Respectfully submitted,

By: /s/ Rudolph A. Telscher, Jr.
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CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of February 2021, I caused the foregoing to be filed electronically with the Clerk of Court and to be served via the Court's Electronic Filing System upon all counsel of record, and to be served via email on all counsel of record at the following:

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